

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN ANTONIO GARCIA-JIMENEZ,

Defendant.

Case:2:18-cr-20653

Judge: Murphy, Stephen J.

MJ: Whalen, R. Steven

Filed: 09-27-2018 At 03:37 PM

INDI USA V. GARCIA-JIMENEZ (NA)

Viol: Title 8 U.S.C. Section

1324(a)(1)(A)(iv)

(Encouraging and Inducing
Illegal Entry)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(8 U.S.C. § 1324(a)(1)(A)(iv) – (ENCOURAGING AND INDUCING ILLEGAL ENTRY))

On or about July 30, 2018, in the Eastern District of Michigan, the defendant, Juan Antonio Garcia-Jimenez, did encourage and induce an alien, namely, Brayan Corado-Recinos, for the purpose of private financial gain, to come to, enter and reside in the United States, and did place in jeopardy the life of the alien, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, in violation of Title 8, United States Code, Section

1324(a)(1)(A)(iv), Title 8, United States Code, Section 1324(a)(1)(B)(i) and Title 8, United States Code, Section 1324(a)(1)(B)(iii).

COUNT TWO

(8 U.S.C. § 1324(a)(1)(A)(iv) – (ENCOURAGING AND INDUCING ILLEGAL ENTRY)

On or about July 30, 2018, in the Eastern District of Michigan, the defendant, Juan Antonio Garcia-Jimenez, for the purpose of private financial gain, did encourage and induce an alien, namely, Ipolito Carpio-Recinos, to come to, enter and reside in the United States, and did place in jeopardy the life of the alien, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), Title 8, United States Code, Section 1324(a)(1)(B)(i) and Title 8, United States Code, Section 1324(a)(1)(B)(iii).

COUNT THREE

(8 U.S.C. § 1324(a)(1)(A)(iv) – (ENCOURAGING AND INDUCING ILLEGAL ENTRY)

On or about August 25, 2018, in the Eastern District of Michigan, the defendant, Juan Antonio Garcia-Jimenez, did encourage and induce an alien, namely, Maria de las Angeles Tellez-Orgaz, for the purpose of private financial gain, to come

to, enter and reside in the United States, and did place in jeopardy the life of the alien, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), Title 8, United States Code, Section 1324(a)(1)(B)(i) and Title 8, United States Code, Section 1324(a)(1)(B)(iii).

COUNT FOUR

(8 U.S.C. § 1324(a)(1)(A)(iv) – (ENCOURAGING AND INDUCING ILLEGAL ENTRY)

On or about August 25, 2018, in the Eastern District of Michigan, the defendant, Juan Antonio Garcia-Jimenez, did encourage and induce an alien, namely, Maura Tellez-Orgaz, for the purpose of private financial gain, to come to, enter and reside in the United States, and did place in jeopardy the life of the alien, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), Title 8, United States Code, Section 1324(a)(1)(B)(i) and Title 8, United States Code, Section 1324(a)(1)(B)(iii).

COUNT FIVE

(8 U.S.C. § 1324(a)(1)(A)(iv) – (ENCOURAGING AND INDUCING ILLEGAL ENTRY)

On or about August 25, 2018, in the Eastern District of Michigan, the defendant, Juan Antonio Garcia-Jimenez, did encourage and induce an alien, namely, Dafne Michel Lopez-Tellez, for the purpose of private financial gain, to come to, enter and reside in the United States, and did place in jeopardy the life of the alien, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), Title 8, United States Code, Section 1324(a)(1)(B)(i) and Title 8, United States Code, Section 1324(a)(1)(B)(iii).

COUNT SIX

(8 U.S.C. § 1324(a)(1)(A)(iv) – (ENCOURAGING AND INDUCING ILLEGAL ENTRY))

On or about August 25, 2018, in the Eastern District of Michigan, the defendant, Juan Antonio Garcia-Jimenez, did encourage and induce an alien, namely, Anderson Arreola-Tellez, for the purpose of private financial gain, to come to, enter and reside in the United States, and did place in jeopardy the life of the alien, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), Title 8, United States Code, Section 1324(a)(1)(B)(i) and Title 8, United States Code, Section 1324(a)(1)(B)(iii).

FORFEITURE ALLEGATION

1. The allegations contained in Counts One - Six of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(6), Title 8, United States Code, Section 1324(b), and Title 28, United States Code, Section 2461.

2. Pursuant to Title 18, United States Code, Section 982(a)(6), Title 8, United States Code, Section 1324(b), and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1324, the defendant, Juan Antonio Garcia-Jimenez, shall forfeit to the United States any conveyance, including any vessel, vehicle, or aircraft, used in the commission of the offense of which the defendant is convicted, any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the defendant is convicted, and any property, real or personal, used to facilitate or intended to be used to facilitate the commission of the offense of which the defendant is convicted. The property to be forfeited to the United States includes, but is not limited to, a money judgment representing the proceeds of the aforementioned offenses and property, involved in and/or that facilitated the aforementioned offenses.

3. If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

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Dated: 9/27/18

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INDI USA V. GARCIA-JIMENEZ (NA)

United States District Court
Eastern District of Michigan**Criminal Case C**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>TPM</i>

Case Title: USA v. Juan Antonio Garcia-JimenezCounty where offense occurred : WayneCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty Indictment/ Information --- no prior complaint.✓ Indictment/ Information --- based upon prior complaint [Case number: 18-mj-30448] Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

9/27/18
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.